

## REMARKS

In the Office Action of August 25, 2008, claims 1, 5-9 and 19 were rejected under 35 U.S.C. 102(e) as allegedly being anticipated by U.S. Patent No. 6,924,824 B2 (“Adachi et al.”). In addition, claims 2, 10 and 13-18 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Adachi et al. in view of U.S. Patent Application No. US 2002/0105510 A1 (“Tsuchiya”) or in view of U.S. Patent No. 5,844,534 ( “Okumura et al.”).

In response, Applicant respectfully asserts that the independent claims 1, 10 and 18 are not anticipated by the cited reference of Adachi et al., as explained below. In view of the following remarks, Applicant respectfully requests that the pending claims 1, 2, 5-10 and 13-18 be allowed.

### A. Patentability of Independent Claims 1, 10 and 18

The independent claim 1 recites in part “*varying the selection of subfield from line to line in each scanning cycle such that the subfields are selected in a consecutive order from line to line as the lines are scanned consecutively, the subfields of two consecutive lines do not overlap with respect to time during each scanning cycle, no two consecutive line scans use the same subfield and no line is scanned using the same subfield twice during the set of scanning cycles,*” which is not disclosed in the cited reference of Adachi et al. Thus, the independent claim 1 is not anticipated by the cited reference of Adachi et al. As such, Applicant respectfully requests that the independent claim 1 be allowed.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

The latest Office Action on page 9 states that “no where in Fig. 5b [of Adachi et al.] shows that selection sequence involves using sub-frame periods that overlap with respect to time for two consecutive lines.” Applicant respectfully disagrees with

this assertion.

In Fig. 5 of Adachi et al., a diagram of a driving sequence showing an alternative example of a scan line selection sequence of embodiment 1 is illustrated. The driving sequence of Fig. 5 of Adachi et al. uses sub-frames, SF1, SF2, SF3 and SF4. As defined in column 10, lines 43-44, and shown in Figs. 3, 4 and 5, the sub-frame periods are 5H, 9H, 17H and 33H for SF1, SF2, SF3 and SF4, respectively. Furthermore, as explained in column 9, lines 32-37, of Adachi et al., “[t]he period of each sub-frame SF1 to SF4 comprises a write time and a hold time, the write time being fixed at one horizontal scanning period (1H) in all of the sub-frames and the hold time being weighted in every sub-frame by the product of the horizontal scanning period, 2 raised to a power, and a constant.” As described in Adachi et al., the sub-frames SF1-SF4 of two consecutive lines overlap with respect to time.

As an example, in the scan line 0 in Fig. 5(d) of Adachi et al. (Fig. 5(d) is a continuation of Fig. 5(b), as explained in column 9, lines 24-30, with respect to Figs. 3(b) and 3(d)), the sub-frame SF4 begins at  $t=31H$  and ends at  $t=64H$ , since the sub-frame SF4 includes the write time of 1H ( $t=31H$  to  $t=32H$ ) and the hold time of 32H ( $t=32H$  to  $t=64H$ ). In the next consecutive scan line 1, the sub-frame SF1 begins at  $t=32H$  and ends at  $t=37H$ , since the sub-frame SF1 includes the write time of 1H ( $t=32H$  to  $t=33H$ ) and the hold time of 4H ( $t=33H$  to  $t=37H$ ). Thus, during  $t=32H$  to  $t=37H$ , the sub-frame SF4 on the scan line 0 overlaps the sub-frame SF1 on the scan line 1 with respect to time. This example clearly shows the sub-frames SF1 and SF4 of two consecutive scan lines 0 and 1 overlap with respect to time, as described and illustrated in the cited reference of Adachi et al. Thus, the cited reference of Adachi et al. does not disclose the limitation of “*varying the selection of subfield from line to line in each scanning cycle such that...the subfields of two consecutive lines do not overlap with respect to time during each scanning cycle,*” as recited in the independent claim 1.

In addition, the Office Action on page 3 states that the cited reference of Adachi discloses “no two consecutive line scans use the same subfield (e.g. Fig. 5 shows line 2<sup>nd</sup> scans use SF1, but SF4 is scanned in line 3<sup>rd</sup>.” Applicant respectfully disagrees with this assertion.

On the scan line 2 in Fig. 5(b) of Adachi et al., there are the sub-frames SF1, SF2 and SF3. However, as shown in Fig. 5(d) which is a continuation of Fig. 5(b), as explained in column 9, lines 24-30, with respect to Figs. 3(b) and 3(d), the scan line 2 further includes the sub-frame SF4, which begins at  $t=35H$ . On the scan line 3 in Fig. 5(b) of Adachi et al., there is only the sub-frame SF4. However, as shown in Fig. 5(d), the scan line 3 further includes the sub-frames SF1, SF2 and SF3, which begins at  $t=36H$ . Thus, there are same sub-frames on scan lines 2 and 3. Consequently, the cited reference of Adachi et al. does not disclose the limitation of “*varying the selection of subfield from line to line in each scanning cycle such that... no two consecutive line scans use the same subfield,*” as recited in the independent claim 1.

Since the cited reference of Adachi et al. does not disclose the claimed limitations with respect to “*the subfields of two consecutive lines do not overlap with respect to time during each scanning cycle*” and “*no two consecutive line scans use the same subfield,*” the independent claim 1 is not anticipated by the cited reference of Adachi et al. As such, Applicant respectfully requests that the independent claim 1 be allowed.

The above remarks are also applicable to the independent claims 10 and 18, which recite limitations similar to the limitations of the independent claim 1. Thus, Applicant respectfully asserts that the independent claims 10 and 18 are also not anticipated by the cited reference of Adachi et al., and requests that these independent claims be allowed as well.

#### B. Patentability of Dependent Claims 2, 5-9 and 13-17

Each of the dependent claims 2, 5-9 and 13-17 depends on one of the independent claims 1 and 10. As such, these dependent claims include all the limitations of their respective base claims. Therefore, Applicant submits that these dependent claims are allowable for at least the same reasons as their respective base claims.

Applicant respectfully requests reconsideration of the claims in view of the remarks made herein. A notice of allowance is earnestly solicited.

Respectfully submitted,  
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